

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIAN SANFORD,

Defendant.

Cause No. 05 CR 1849 JH

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CLERK-ALBUQUERQUE

MOTION TO AUTHORIZE OUT OF STATE TRAVEL


COMES NOW the Defendant, Adrian Sanford, by and through his counsel of record, Robert R. Cooper, and respectfully requests that this Court enter an Order authorizing Mr. Sanford to travel out of state and as grounds, Counsel for Defendant states:

1. Mr. Sanford is charged as a co-defendant in a four count Superseding Indictment filed on April 25, 2006.
2. Mr. Sanford is scheduled to travel by airplane on Saturday, December 9, 2006 from his home in Tucson, Arizona to Los Angeles, California for the purpose of a family vacation. Mr. Sanford is scheduled to return to his home in Tucson, Arizona on Thursday, December 14, 2006.
3. Mr. Sanford has maintained contact with the undersigned attorney. Mr. Sanford is not a flight risk.
4. The undersigned counsel has contacted Assistant United States Attorney James Braun regarding this Motion. Mr. Braun has indicated that the Government does not oppose this Motion.

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5. The undersigned counsel has also contacted United States Pre-Trial Service Officer Al Carranza regarding this Motion. Mr. Carranza does not oppose this Motion.

WHEREFORE, Defendant Adrian Sanford respectfully requests that this Court enter an Order allowing Mr. Sanford to travel by airplane from his home in Tucson, Arizona to Los Angeles, California for the purpose of a family vacation from Saturday, December 9, 2006 to Thursday, December 14, 2006.



ROBERT R. COOPER
Counsel for Defendant
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion to Authorize Travel Out of State was mailed to Assistant United States Attorney James Braun, P.O. Box 607, Albuquerque, New Mexico, 87103 on this 6 day of December, 2006.



ROBERT R. COOPER